

**Hearing Date and Time: October 9, 2024 at 11:00 a.m. (prevailing Eastern Time)**  
**Objection Deadline: October 2, 2024, at 4:30 p.m. (prevailing Eastern Time)**

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*Counsel for the Debtors*

In re:

Chapter 11

MERCON B.V.,<sup>1</sup>

Case No. 23-11947 (MEW)

Debtors.

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**NOTICE OF HEARING ON FINAL APPLICATIONS FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT  
OF EXPENSES ON OCTOBER 9, 2024 AT 11:00 A.M.**

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<sup>1</sup> On August 21, 2024, the Court entered the *Order Containing a Post-Confirmation Timetable as Required by Local Rule 3021-1*, closing the chapter 11 cases of Mercon Coffee Corporation and certain of its debtor affiliates and thereby directing that all motions, notices, and other pleadings related to any of the affiliated debtors be filed in this case. Prior to the Effective Date, the Debtors in these cases, along with the last four (4) digits of each Debtor's federal tax identification number, if applicable, were: Mercon Coffee Corporation (1844); Mercon B.V. (N/A); Mercon Brasil Comércio de Café Ltda. (N/A); Agro International Holding B.V. (N/A); Mercapital de Nicaragua, S.A. (N/A); Distribuidora de Granos de Nicaragua S.A. (N/A); Cisa Export S.A. (N/A); Comercial Internacional de Granos de Honduras, S.A. de C.V. (N/A); Mercon Guatemala, S.A. (N/A); Comercial Internacional Exportadora, S.A. (N/A).

**PLEASE TAKE NOTICE** that the retained professionals for Mercon Coffee Corporation and its affiliated debtors, as debtors in the chapter 11 cases (collectively, the “**Debtors**”), and the retained professionals for the Official Committee of Unsecured Creditors filed the following applications for final compensation for services rendered and reimbursement of actual and necessary expenses incurred during the respective periods set forth below (the “**Fee Applications**”):

<b>Doc. No.</b>	<b>Date Filed</b>	<b>Applicant</b>	<b>Period</b>	<b>Fees Requested</b>	<b>Expenses Requested</b>
12	08/30/2024	Chipman Brown Cicero & Cole, LLP	December 13, 2023 through March 31, 2024	\$494,650.37	\$3,306.84
14	08/30/2024	Miller Friel, PLLC *Administrative Claim	April 9, 2024 through July 31, 2024	\$57,175.42	\$0.00
15	08/30/2024	O’Melveny & Myers LLP	December 6, 2023 through July 31, 2024	\$1,471,943.50	\$5,670.58
16	08/30/2024	Kroll Restructuring Administration LLC	December 6, 2023 through July 31, 2024	\$74,217.74	\$70.00
17	08/30/2024	Ankura Consulting Group, LLC	December 29, 2023 through July 31, 2024	\$449,943.45	\$350.00
18	08/30/2024	Baker & McKenzie LLP	December 26, 2024 through July 31, 2024	\$7,390,359.47	\$91,340.47
19	08/30/2024	Dentons Nicaragua, S.A.	January 25, 2024 through July 31, 2024	\$50,000	\$7,500
20	08/30/2024	Resor N.V.	December 6, 2023 through July 31, 2024	\$638,308.60	\$137,613.67
21	08/30/2024	Kroll Restructuring Administration LLC *Administrative Claim	June 30, 2024 through July 31, 2024	\$348,533.35	\$0.00
22	08/30/2024	Great Southern Cross Commodities Pty Ltd	December 6, 2023 through July 31, 2024	\$2,008,206.00	\$79,554.16
23	08/30/2024	Togut, Segal & Segal LLP	June 12, 2024 through July 31, 2024	\$203,266.50	\$1,037.76
24	08/30/2024	Riveron Management Services, LLC	December 6, 2023 through July 31, 2024	\$3,217,755.52	\$25,506.27

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider entry of an order granting the relief requested in each Fee Application (the “**Hearing**”) will be conducted through Court Solutions LLC on **October 9, 2024 at 11:00 a.m. (Prevailing Eastern Time)**. Parties should not appear in person and those wishing to appear telephonically or participate at the hearing (whether “live” or “listen only”) must schedule an appearance prior to 12:00 p.m. (Prevailing Eastern Time) on October 8, 2024 by using the following link: <https://www.court-solutions.com/>. Instructions for making a telephonic appearance and additional information on the Court’s telephonic procedures can be found at <https://www.nysb.uscourts.gov/sites/default/files/m543.pdf>.

**PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Fee Applications shall (i) be in writing, (ii) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, (iii) be filed with the Bankruptcy Court by (a) attorneys electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) and (b) all other parties in interest on a CD-ROM, in text-searchable portable document format and, (iv) be served in accordance with General Order M-399, the Bankruptcy Rules, and the Local Bankruptcy Rules upon (a) counsel to the Debtors, Baker & McKenzie LLP (Attn: Paul J. Keenan Jr., John R. Dodd, Blaire Cahn, Reginald Sainvil) 452 Fifth Avenue, New York, New York 10018, (b) counsel to the Prepetition First Lien Agent, Cadwalader, Wickersham & Taft LLP (Attn: Ingrid Bagby and Andrew Greenberg) 200 Liberty Street, New York, NY 10281, (c) counsel to the United States Trustee (Attn: Daniel Rudewicz) One Bowling Green, Suite 534, New York, NY 10004, (d) counsel to the Official Committee of Unsecured Creditors, O’Melveny & Myers LLP (Attn: Louis R. Strubeck, Jr. and Matthew P. Kremer), 7 Times Square, New York, New York 10036, and to O’Melveny & Myers LLP (Attn: Gregory M. Wilkes and Scott P. Drake), 2801 North Harwood Street, Suite 1600, Dallas, Texas 75201, and (e)

counsel to the Liquidating Trustee, Robert A. Weber, Chipman Brown Cicero & Cole, LLP, Hercules Plaza, 1313 North Market Street, Suite 5400, Wilmington, Delaware 19801, by no later than **October 2, 2024 at 4:30 p.m. (prevailing Eastern Time)** (the “**Objection Deadline**”). The docket number to which the filing relates shall be included in the upper right-hand corner of the caption of all objections.

**PLEASE TAKE FURTHER NOTICE** that if no Objection to a Fee Application is timely filed and served by the Objection Deadline, the Bankruptcy Court may grant the relief requested in such Fee Application without further notice or opportunity to be heard.

**PLEASE TAKE FURTHER NOTICE** that any objecting parties are required to attend the Hearing and failure to appear may result in relief being granted upon default.

Dated: August 30, 2024

**BAKER & MCKENZIE LLP**

By: /s/ Reginald Sainvil

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